

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**JOINT INFORMATIVE MOTION OF AMBAC ASSURANCE CORPORATION,
FINANCIAL GUARANTY INSURANCE COMPANY, THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS, THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, AND THE PUERTO RICO FISCAL
AGENCY AND FINANCIAL ADVISORY AUTHORITY WITH RESPECT TO
(I) THE URGENT MOTION OF AMBAC ASSURANCE CORPORATION AND
FINANCIAL GUARANTY INSURANCE COMPANY TO COMPEL DISCOVERY
FROM THE GOVERNMENT PARTIES IN CONNECTION WITH THE DISCLOSURE
STATEMENT, AND (II) THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS' URGENT MOTION TO COMPEL DISCLOSURE STATEMENT
DISCOVERY FROM OVERSIGHT BOARD AND AAFAF**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

To the Honorable United States District Judge Laura Taylor Swain:

Ambac Assurance Corporation (“Ambac”), Financial Guaranty Insurance Company (“FGIC”), the Official Committee of Unsecured Creditors (the “UCC”), the Financial Oversight and Management Board for Puerto Rico (the “Board”), and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”, and, together with the Board, the “Government Parties”) (collectively, the “Parties”) respectfully submit this Joint Informative Motion to advise the Court of the Parties’ agreed briefing schedule for (i) the *Urgent Motion of Ambac Assurance Corporation and Financial Guaranty Insurance Company to Compel Discovery from the Government Parties in Connection with the Disclosure Statement*, and (ii) the *Official Committee of Unsecured Creditors’ Urgent Motion to Compel Disclosure Statement Discovery from Oversight Board and AAFAF* (the “Discovery Motions”), filed contemporaneously herewith.

1. The Discovery Motions seek orders compelling the Government Parties to produce documents and deposition testimony in response to discovery requests served by Ambac and FGIC, on the one hand, and the UCC, on the other hand. The discovery requests seek information Ambac, FGIC and the UCC contend relates to the Disclosure Statement,² as to which objections are due on June 15, 2021. In light of the June 15, 2021 deadline, Ambac, FGIC, and the UCC seek relief on an urgent basis. Although the Government Parties do not believe there is any urgency, they have agreed to the schedule set forth herein.

2. The Parties have agreed that the following briefing schedule would be appropriate for the Discovery Motions:

- **June 3, 2021:** Deadline for objections or responses to the Discovery Motions.

² Capitalized terms not defined herein have the meanings ascribed to them in the Discovery Motions.

- **June 8, 2021:** Deadline for any replies to any objections or responses to the Discovery Motions.

Dated: May 26, 2021
San Juan, Puerto Rico

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CERTIFICATE OF SERVICE

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

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